

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re

DONNA L. COOPER

Debtor

) Chapter 7, No. 09-30152-HJB
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**MOTION FOR AN ORDER APPROVING BIDDING
PROCEDURES AND BREAKUP FEE**

To the HONORABLE HENRY J. BOROFF, Bankruptcy Judge:

Now comes JOSEPH B. COLLINS ("Trustee"), Trustee in Bankruptcy of Donna L. Cooper ("Debtor") and, pursuant to Massachusetts Local Bankruptcy Rule 6004-1(c)(2), hereby moves this Honorable Court for an Order approving certain procedures to govern any competitive bidding on the proposed sale of property of the Bankruptcy Estate and approving a Breakup Fee protecting the initial proposed purchaser of such property. In support of this Motion, the Trustee respectfully represents as follows:

1. On February 8, 2009, the Debtor filed a Voluntary Petition pursuant to the provisions of Chapter 7 of the U.S. Bankruptcy Code with the United States Bankruptcy Court for the District of Massachusetts ("Court").

2. On February 9, 2009, the Trustee accepted an appointment as Chapter 7 Trustee of the Debtor's Bankruptcy Estate and continues to serve in such capacity.

3/29/10 DENIED AS TO THE REQUEST TO PERMIT TELEPHONIC APPEARANCES. GRANTED AS TO ALL OTHER PROCEDURES.

Henry J. Boroff